

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA
v.
GREDE, LLC, ET AL.

EXHIBIT LIST

Case Number: 17-CR-50

Presiding Judge HONORABLE WILLIAM C. GRIESBACH			Plaintiff's Attorneys DANIEL HUMBLE, KEITH ALEXANDER, AUSAs; JAMES CHA, SAUSA		Defendants' Attorneys DAVID SIMON, LINDA BENFIELD, JOHN TURLAIS, AMANDA BEGGS, MICHAEL FITZGERALD, STEPHEN HURLEY, DEAN STRANG
Trial Date(s) June 5, 2017			Court Reporter		Courtroom Deputy
Plf. No.	Def. No.	Date Offered	Marked/ Admitted	Witness	DESCRIPTION OF EXHIBITS AND WITNESSES
1					Firebrick Engineers Co. Quote (October 2011)
2					GRP Mechanical, Inc., Quote (September 2011)
3					Wayde Schwarz Email (Oct. 14, 2011)
4					Table of Heat Treat Oven Project Costs
5					Notes – Heat Treat Oven Scope of Work
6					Photograph of Heat Treat Oven
7					Photograph of Super Sucker Vacuum
8					Photograph of Asbestos-Containing Material
9					Written Statements, Other Records, of David Stewart
10					Christy McNamee Email to Donald Alcorn, re: injuries (Dec. 28, 2011)
11					Mark Dugenske Email to Christy McNamee, re: Super Sucker and Heat Treat Oven (1/11/2012)
12					Christy McNamee Email to Mark Dugenske, re: policy to wear respirators (1/11/2012)
13					Christy McNamee Email to Mark Dugenske, re: testing of material on Heat Treat Oven (1/11/2012)
14					Peter Mark Email re: OSHA visit (1/19/2012)
15					Peter Mark Memorandum re: OSHA Visit to Berlin (January 19, 2012)

16				Peter Mark Email to Larry Foreman, re: “undetectable” results, instruction to post results (1/27/2012)
17				Posting Certification, January 28, 2012
18				Peter Mark Email re: talk with union steward (2/19/2012)
19				Heat Treat Oven Total Action Item List (1/23/2012)
20				PLM Analytical Report, American Air Environmental Services, Inc. (2/20/2012)
21				Peter Mark Email to Larry Foreman, re: Asbestos Testing at Berlin, Results (2/24/2012)
22				Larry Foreman Email to Peter Mark, re: Asbestos Testing at Berlin (2/24/2012)
23				Peter Mark Email to Larry Foreman, re: Asbestos Testing at Berlin (2/24/2012)
24				Peter Mark Email to Larry Foreman, re: Off the record comment on Berlin asbestos concerns (2/25/2012)
25				Anonymous Letter to Christy McNamee, re: asbestos
26				Anonymous Summary of Asbestos Issues at Grede Berlin Foundry
27				OSHA Inspection Reports (Jan. & Feb. 2012)
28				Asbestos Awareness Training modules, presentations sent to Peter Mark in February 2012 (Group Exhibit)
29				Jessica Fournier Email transmitting Asbestos Laboratory Analysis Report (2/27/2012)
30				Analytical Laboratory Report, Wisconsin Occupational Health Laboratory (Feb. 22, 2012)
31				Christy McNamee Email to Steve O’Connell, re: “Sorry we found asbestos” (2/24/2012)
32				Christy McNamee Email to Steve O’Connell, forwarding Email from Peter Mark re: Asbestos Testing at Berlin (2/24/2012)
33				Christy McNamee Email to Steve O’Connell, forwarding Jessica Fournier Email with Asbestos Testing Results (2/27/2012)
34				Analytical Laboratory Report, Wisconsin Occupational Health Laboratory (Feb. 22, 2012)
35				Peter Mark Email re: Asbestos Program for Grede- Berlin (2/27/2012)
36				Asbestos Survey & Assessment Report, Grede Reedsburg facility (April 20, 2000)
37				P. Mark Email re: Asbestos program for Grede-Berlin (2/28/2012)
38				Larry Foreman Email replying to P. Mark Email re: Asbestos program for Grede-Berlin (2/28/2012)
39				Asbestos Awareness Training document
40				C. McNamee Email re: Asbestos Awareness Training (2/28/2012)

41					Asbestos Awareness Training document (attached to C. McNamee's Email dated 2/28/2012)
42					Don Alcorn Email re: completing training (2/28/2012)
43					Asbestos Awareness Training Records
44					Asbestos Awareness Training module for Grede New Castle facility
45					Janine Wright Email transmitting "Asbestos Remediation in Berlin, 2012" Power Point (2/28/2012)
46					"Asbestos Remediation in Berlin, 2012" Power Point
47					"Asbestos Remediation in Berlin" Power Point
48					"Asbestos Remediation in Berlin, 2012" Power Point
49					P. Mark Email re: Asbestos Training (2/28/2012)
50					Asbestos Awareness Training document attached to P. Mark's 2/28/2012 Email
51					John Rader Email re: Asbestos Meetings (3/05/2012)
52					Asbestos Meeting Schedule (attached to John Rader's 3/05/2012 Email re: Asbestos Meetings
53					P. Mark Email replying to John Rader Email re: "draft 3 of asbestos training" (2/28/2012)
54					P. Mark Email replying to John Rader Email re: "draft 4 of asbestos training" (2/28/2012)
55					P. Mark Email to Wayde Schwarz re: Eagle Environmental (3/07/2012)
56					Records of April 2012 Sample Analysis, American Air Environmental Services, Inc.
57					Email from P. Mark transmitting April 2012 PLM Analytical Report (by American Air Environmental Services) to Mike Mikelonis
58					PLM Analytical Report (by American Air Environmental Services) with April 2012 Asbestos Analysis Results
59					Record of Christy McNamee "Change of Address" – 320 Madison Ave., Omro, WI
60					Advanced Asbestos Removal Email to C. McNamee (5/17/2012)
61					QuanTEM Laboratories Polarized Light Microscopy Analysis Report (5/17/2012), attached to Email from Advanced Asbestos Removal to C. McNamee
62					Advanced Asbestos Removal Sampling Report (5/16/2012)
63					Advanced Asbestos Removal Quote (5/17/2012)
64					Undated Draft Letter to OSHA and WDNR
65					"Grede Berlin Asbestos Contaminated Material (ACM) Summary"

66					"Original Full Summary from Peter Mark – Grede EHS Director"
67					C. McNamee Email to Bill Goodwin transmitting Hotline Report (5/16/2012)
68					Hotline Call Letter from C. McNamee
69					P. Mark Email to Phillip Gray re: "draft asbestos program for Grede-Berlin" (5/10/2012)
70					P. Mark Email to Phillip Gray re: "draft asbestos program for Grede-Berlin" (5/10/2012) "Attempt # 2"
71					Grede-Berlin Asbestos Program
72					Grede-Berlin Asbestos Awareness Training Program
73					P. Mark Email to C. McNamee transmitting Asbestos Medical Questions (6/11/2012)
74					Grede-Berlin Medical Questionnaire for Asbestos Exposure
75					Grede-Berlin Asbestos Awareness Training Program
76					P. Mark Email to C. McNamee transmitting Asbestos Medical Questions (6/11/2012) "Attempt # 2"
77					Grede-Berlin Medical Questionnaire for Asbestos Exposure
78					Grede-Berlin Asbestos Examination Policy
79					Email from Sharon Reyes, OSHA, to C. McNamee, re: Grede air sample (6/13/2012)
80					2/17/12 Asbestos Results for Heat Treat Oven Area
81					Email (2 nd) from Sharon Reyes, OSHA, to C. McNamee, re: Grede air sample (6/13/2012)
82					Emails btwn. C. McNamee and P. Mark re: OSHA Citation (June 2012)
83					C. McNamee Email Transmitting Copy of OSHA Citation (6/18/2012)
84					OSHA Citation, Expedited Settlement Offer, Notice of Penalty (6/13/2012)
85					Christy McNamee Email transmitting draft letter to OSHA (6/26/2012), Letter and attachments
86					Christy McNamee Email transmitting "final" version of letter to OSHA (6/27/2012), Letter and attachments
87					Email from P. Mark to C. McNamee re: changes to letter to OSHA (6/27/2012)
88					Letter to OSHA, revised by P. Mark (with attachments)
89					Email from C. McNamee to P. Mark, re: mailing letter to OSHA, posting letter (6/28/2012)
90					Email from P. Mark to Mike Mikelonis, et al, re: OSHA Citation (6/24/2012)
91					Email from Mike Mikelonis to P. Mark re: OSHA Citation (6/25/2012)

92					Email from P. Mark to C. McNamee, J. Wright, re: draft of letter to asbestos-exposed employees (6/15/2012)
93					Draft Letter re: Asbestos Exposure (attached to 6/15/2012 Email from P. Mark)
94					P. Mark Email to Mike Mikelonis, re: settlement of OSHA citation (6/26/2012)
95					C. McNamee Email to P. Mark, re: Abetment [sic] Letter for Asbestos (6/28/2012)
96					Letter to OSHA (dated June 26, 2012), with attachments
97					C. McNamee Email to P. Mark re: Respirator Awareness Training (9/26/2011)
98					Respirator Training Document
99					Respirator Usage Training Document
100					Grede Holding LLC, Information for Voluntary Respirator Use Documentation
101					C. McNamee Email re: Job Safety Analysis Procedure (1/23/2012)
102					C. McNamee Emails to P. Mark and S. O'Connell, re: Supervisor procedure for writing job safety procedures (1/19/2012)
103					Document entitled, "Supervisor procedure for writing job safety procedures"
104					Grede-Berlin Safety Manual, Respiratory Protection
105					C. McNamee Email to M. Bryan, re: Asbestos Abatement Forms (7/02/2012)
106					Certification of Corrective Action document
107					OSHA Expedited Informal Settlement Agreement (signed 7/03/2012)
108					Email from Peter Mark re: "wall to wall" asbestos review (6/26/2012)
109					Grede II, LLC, Purchase Orders for work on Heat Treat Oven
110					Grede II, LLC, Purchase Orders for work on Heat Treat Oven
111					Grede Letter to David Stewart re: Asbestos Exposure
112					Professional Coating Technologies Invoices
113					Grede Letter to C. McNamee re: Termination of Employment (July 27, 2012)
114					Grede Hiring Letter to Mitchell Kidd (October 6, 2011)
115					P. Mark Notes of Interviews of Grede Employees re: work on Heat Treat Oven
116					Email and proposal from Fire Brick Engineers, Inc., to Grede (October 4, 2011)
117					Robinson Bros. Asbestos Removal Work Records

118					NEIC Laboratory Report (July 2015)
119					NEIC Memorandum Report (May 2016)
120					NEIC Laboratory Results and Photographs (February 2016)
121					OSHA Penalty Calculation Worksheets, OSHA
122					Letter signed by Allan “Brooks” Arruda (dated 1/12/2012)
123					NEIC Photograph of Locked Container with Samples (May 2015)
124					NEIC Photograph of Sample (May 2015)
125					NEIC Photograph of Locked Container with Sample (December 2015)
126					NEIC Photograph of Sample in Sealed Bag (December 2015)
127					NEIC Photograph of Sample (December 2015)
128					Photographs by NEIC, from EPA Search of Grede Foundry (December 2015)
129					Peter Mark Application for Employment
130					2012 Grede Annual Management Encouragement (GAME) Plan Award to Peter Mark
131					Grede II, LLC, Corporate Record
132					Grede, LLC, Corporate Record
133					Grede II, LLC, Corporate Record
134					Grede, LLC, Corporate Record
135					Corporate Record, Grede Wisconsin Subsidiaries
136					Excerpts from U.S. Dept. of Labor Deposition of Peter Mark, January 30, 2015
137					Corporate Records, Grede, LLC, and Grede II, LLC, from Wisconsin Dept. of Financial Services (Group Exhibit)
138					Photographs of Grede Foundry, EPA-CID (April 2017)
139					Table of Results of PLM Analysis by NEIC (Demonstrative Exhibit)
140					Laboratory Records from American Air Environmental Services, April and May 2012
141					Microscope Slide View of Asbestos Sample
142					WDNR Inspection Reports, Reports of Conversations (2012)
143					Records from Personnel Files of Peter Mark, from Grede
144					Physical Sample of Asbestos-Containing Material (rec'd. by U.S. EPA May 2015)
145					Physical Sample of Asbestos-Containing Material (rec'd. by U.S. EPA May 2015)
146					Physical Sample of Asbestos-Containing Material (rec'd. by U.S. EPA May 2015)

147					Physical Sample of Asbestos-Containing Material (rec'd. by U.S. EPA December 2015)
148					American Air Environmental Services, PLM Analytical Report (2/24/2012)
149					Email from Mark Dugenske to Christy McNamee re: Testing of sample (January 17, 2012)
150					Email from Wayde Schwarz to Christy McNamee re: Furnace samples (January 17, 2012)
151					D. Stewart Photographs
152					Grand Jury Subpoena (2013)
153					Grand Jury Subpoena (2016)
154					Grand Jury Subpoena Response (2013) (Group Exhibit)
155					Grand Jury Subpoena Response (2015) (Group Exhibit)
156					Letter from Foley & Lardner, Appendix, re: P. Mark Documents (February 22, 2017)
157					Emails re: Drawings of Heat Treat Oven (November 2011)
158					Diagram of Heat Treat Oven
159					Email from C. McNamee to M. Mikelonis and J. Rader, re: Final letter to OSHA (June 28, 2012)
160					Final letter to OSHA, with attachments (attached to C. McNamee's June 28, 2012, email)
161					C. McNamee Email re: Plant Asbestos Review (June 28, 2012)
162					C. McNamee Email to P. Mark, re: Abatement Certification Forms (July 2, 2012)
163					Certification of Corrective Action (attached to C. McNamee's July 2, 2012, Email)
164					NEIC Memorandum dated February 9, 2016, entitled "Summary of NEIC Technical Coordinator (NTC) Field Activities, Grede Foundry, Berlin, Wisconsin"